Request No. 33

All documents concerning any of Plaintiff's claims for damages from lost enjoyment of the Apartment, including but not limited to the "Loss of enjoyment of NYC apartment" referenced on page 5 of the Plaintiff's Initial Disclosures.

Request No. 34

All documents concerning any of Plaintiff's claims for damages from housing court judgments, including but not limited to the "Housing court judgments" referenced on page 5 of the Plaintiff's Initial Disclosures.

Request No. 35

All documents concerning any of Plaintiff's claims for damages for the time and cost to prepare documents in connection with any claim against any of the BPCA Defendants, including but not limited to the "Time and cost to prepare documents" referenced on page 5 of the Plaintiff's Initial Disclosures.

Request No. 36

All documents concerning any of Plaintiff's claims for damages from travel, including but not limited to the "Travel to court" referenced on page 5 of the Plaintiff's Initial Disclosures. Such documents should include, but not be limited to, receipts for transportation, gasoline, and tolls, and proof of mileage travelled.

Request No. 37

All documents concerning any of Plaintiff's claims for damages from paralegal fees, including but not limited to the "Paralegal fees" referenced on page 5 of the Plaintiff's Initial Disclosures. Such documents should include, but not be limited to, invoices for paralegal time expended and tasks undertaken, amounts charged, and proof of payment by Plaintiff.

Request No. 38

All documents concerning any of Plaintiff's claims for damages from attorney fees and costs, including but not limited to the "Attorney fees and costs" referenced on page 5 of the Plaintiff's Initial Disclosures. Such documents should include, but not be limited to, invoices for attorney time expended and tasks undertaken, amounts charged, and proof of payment by Plaintiff.

Request No. 39

All documents concerning the allegation that "Plaintiff is a journalist," referenced at ¶20 of the Corrected Amended Complaint.

Request No. 40

All documents concerning any compensation received by Plaintiff for any work Plaintiff claims is as a journalist.

Request No. 41

All published writings of Plaintiff via any media other than on the BatteryPark.tv or The Healthcare Channel websites.

Request No. 42

All documents concerning any press pass or press credentials issued to Plaintiff.

Request No. 43

All documents relating to Plaintiff's contention that Plaintiff's journalism has been "referenced in "congressional testimony" [sic], as referenced in ¶21 of the Corrected Amended Complaint.

Request No. 44

All documents concerning e-mail subscribers to BatteryPark.tv, including but not limited to the names and email addresses of such subscribers.

Request No. 45

All documents concerning the monthly number of visitors to BatteryPark.tv, including but not limited to the monthly number of unique visitors.

Request No. 46

All documents concerning the contention in ¶20 of the Corrected Amended Complaint that BatteryPark.tv is "one of the most viewed local news website [sic] for Downtown Manhattan."

Request No. 47

All documents concerning revenue from BatteryPark.tv, including but not limited to revenue from advertisements, subscriptions, grants, or donations.

Request No. 48

All documents concerning The Healthcare Channel referenced in ¶116 of the Corrected Amended Complaint.

Request No. 49

All documents concerning e-mail subscribers to The Healthcare Channel, including but not limited to the names and email addresses of such subscribers.

Request No. 50

All documents concerning the monthly number of visitors to The Healthcare Channel, including but not limited to the monthly number of unique visitors.

Request No. 51

All documents concerning revenue from The Healthcare Channel, including but not limited to revenue from advertisements, subscriptions, grants, or donations.

Request No. 52

All medical textbooks written by Plaintiff as referenced in ¶¶18-19 of the Corrected Amended Complaint.

Request No. 53

All "peer-review research papers" written by Plaintiff as referenced in ¶18 of the Corrected Amended Complaint.

Request No. 54

Documents concerning any "prestigious federal research grants to conduct clinical trials" awarded to Plaintiff, as referenced in ¶¶18-19 of the Corrected Amended Complaint.

Request No. 55

Documents concerning any "strenuous background checks, fingerprinting, and extensive state and federal testing" undergone by Plaintiff, as referenced in ¶18 of the Corrected Amended Complaint.

Request No. 56

Documents concerning requests by "medical directors of large New York long-term care facilities" that Plaintiff "speak at grand rounds to educate their staff," as referenced in ¶19 of the Corrected Amended Complaint.

Request No. 57

Documents concerning Plaintiff's alleged participation in "oversight activities assisting the U.S. Senate and House investigate waste and fraud in medicine," and in the passage of the Physicians Payments Sunshine Act, as referenced in ¶21 of the Corrected Amended Complaint.

Request No. 58

All op-ed articles written by Plaintiff as referenced in ¶20 of the Corrected Amended Complaint, including but not limited to articles published in *The Wall Street Journal*.

Request No. 59

All documents concerning the "rare sale[] that Milstein has ever made of the original rental apartments set aside in the 1980's was a sale to a BPCA board member, Robert Mueller, at below-market-rate [sic]," as referenced in ¶32 of the Corrected Amended Complaint.

Request No. 60

All documents concerning the contention in ¶44 of the Corrected Amended Complaint that "Defendant Milford had schemed to sabotage street safety measures planned by the City DOT[.]"

Request No. 61

All documents concerning Plaintiff's payment of rent for the Apartment in a timely or late manner, including but not limited to receipts and notices of late payment.

Request No. 62

All documents concerning the contention in ¶55 of the Corrected Amended Complaint that "Plaintiff's reporting has alerted several state and federal agencies about wrongdoing by Mr. Mehiel's BPCA, and various levels of investigation are underway."

Request No. 63

All documents concerning the "Friends of BPC" organization referred to in ¶30 of the Corrected Amended Complaint, including but not limited to organizational documents, meeting minutes, schedules or programs or initiatives or events, and membership lists of "Friends of BPC."

Request No. 64

All documents concerning complaint(s) lodged against Plaintiff, and/or discipline proposed or taken with respect to Plaintiff, during the past 10 years.

Request No. 65

All documents concerning the "agreement [between building management and building staff] to not talk to Plaintiff about details of the business of the building," which agreement Plaintiff stated "will be produced during discovery," as referred to in ¶106 of the Corrected Amended Complaint.

Request No. 66

All documents concerning any complaint(s) lodged against Plaintiff by the staff or former staff of the building at 200 Rector Place, NY, NY, including but not limited to those referred to in ¶107 of the Corrected Amended Complaint.

Request No. 67

All documents concerning any complaint(s) lodged against Plaintiff by residents or former residents of the building at 200 Rector Place, NY, NY.

Request No. 68

All documents relating to Plaintiff's medical licensing, including but not limited to all applications for licensing, applications for renewals, and all licenses received.

Request No. 69

All documents reflecting Plaintiff's first license to practice medicine.

Request No. 70

All documents concerning whether Plaintiff is currently licensed to practice medicine.

Request No. 71

All documents concerning whether Plaintiff's license to practice medicine has ever been revoked, suspended or terminated.

Request No. 72

All documents concerning any professional complaint(s) lodged against Plaintiff, and/or professional discipline considered, proposed or taken with respect to Plaintiff, including reprimand, censure, sanction, revocation of a license, or any other punishment or penalty.

Request No. 73

Unredacted and unedited versions of all documents attached to the Corrected Amended Complaint.

Dated: New York, New York
November 14, 2016

SIVE, PAGET & RIESEL P.C.
Attorneys for the BPCA Defendants

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steve@batterypark.tv
(via email and regular mail)

Deborah Riegel, Esq.

EXHIBIT A

AUTHORIZATION AND RELEASE FOR MEDICAL RECORDS

PURSUANT TO HIPAA

Patient Name	Steven Greer
Date of Birth	
Social Security Number	
Patient Address	

I request that health information regarding my care and treatment be released as set forth on this form. In accordance with New York State Law and the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), I understand that:

1. This authorization may include disclosure of information relating to **ALCOHOL and DRUG ABUSE, MENTAL HEALTH TREATMENT, and CONFIDENTIAL HIV RELATED INFORMATION** only if I place my initials on the appropriate line in Item 9(a). In the event the health information described below includes any of these types of information, and I initial the line on the box in Item 9(a), I specifically authorize release of such information to the person(s) indicated in Item 8.

2. If I am authorizing the release of HIV-related, alcohol or drug-related treatment, or mental health treatment information, the recipient is prohibited from redisclosing such information without my authorization, unless permitted to do so under federal or state law. I understand that I have the right to request a list of people who may receive or use my HIV-related information without authorization. If I experience discrimination because of the release or disclosure of HIV-related information, I may contact the New York State Division of Human Rights at (212) 480-2493 or the New York City Commission of Human Rights at (212) 306-7450. These agencies are responsible for protecting my rights.

3. I have the right to revoke this authorization at any time by writing the health care provider listed below. I understand that I may revoke this authorization except to the extent that action has already been taken based on this authorization.

4. I understand that signing this authorization is voluntary. My treatment, payment, enrollment in a health plan, or eligibility for benefits will not be conditioned upon my authorization of this disclosure.

5. Information disclosed under this authorization might be redisclosed by the recipient (except as noted above in Item 2), and this redisclosure may no longer be protected by federal or state law.

6. **THIS AUTHORIZATION DOES NOT AUTHORIZED YOU TO DISCUSS MY HEALTH INFORMATION OR MEDICAL CARE WITH ANYONE OTHER THAN THE ATTORNEY OR GOVERNMENTAL AGENCY SPECIFIED IN ITEM 9(b).**

7. Name and address of health provider to release this information	
8. Name and address of person(s) or category of person to whom this information will be sent	Attorneys from Sive, Paget, and Riesel, P.C., 560 Lexington Avenue, NY, NY 10022
9(a). Specific information to be released	Entire medical record from January 1, 2009 to present, including patient histories, office notes, psychotherapy notes, test results, radiology studies, films, referrals, consults, billing records, insurance records, and records sent to you by other health care providers. Include (Please initial where indicated): _____ (initial here) Alcohol/Drug Treatment _____ (initial here) Mental Health Information
9(b). Authorization to discuss health information	By initialing here _______ I authorize ______________________ (name of individual health care provider) to discuss my health care information with attorneys from Sive, Paget, and Riesel, P.C., 560 Lexington Avenue, NY, NY 10022.
10. Reason for release of this information	Litigation filed by Steven Greer, *Greer v. Mehiel, et. al*, claiming damages based on specific harms to health and mental health, including depression and anxiety
11. Date or event on which this authorization will expire	At conclusion of *Greer v. Mehiel, et. al*

All items on this form have been completed and my questions about this form have been answered. In addition, I have been provided a copy of the form.

______________________________ ______________________________

Signature of the patient Date